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August 27, 2020

By ECF

Hon. Ronnie Abrams
United States District Judge
U.S. District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Venture Group Enterprises, Inc. v. Vonage Business Inc.*
No. 1:20-cv-04095-RA

Dear Judge Abrams:

We represent Venture Group Enterprises, Inc. ("Venture") in the above-referenced action. Pursuant to Paragraph 5 of Your Honor's Individual Practices in Civil cases, Venture submits this letter motion for leave to file under seal its August 27, 2020 letter motion for leave to file an amendment to the parties' August 21, 2020 letter (Dkt. 17).

Venture submits this letter motion for leave to file under seal only out of an abundance of caution. Vonage had objected, on Federal Rule of Evidence 408 grounds, to the filing of the information Venture seeks leave, through its letter motion, to file.

No later than September 2, 2020, Plaintiff shall provide the Court with the reasoning for why, under the standard set forth in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006), sealing its letter motion and supporting papers is justified. If Defendant seeks to file a response to Plaintiff's sealing request and/or Plaintiff's letter motion, it shall do so no later than September 9, 2020.

Respectfully submitted,

/s/ Joseph A. Boyle

Joseph A. Boyle

SO ORDERED.



Hon. Ronnie Abrams

8/28/2020